

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO *et al.*,

Debtors.<sup>1</sup>

X  
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:  
: PROMESA  
: Title III  
:  
: Case No. 17-BK-3283 (LTS)  
:  
: (Jointly Administered)  
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X

**SECOND VERIFIED STATEMENT OF THE SERVICE EMPLOYEES  
INTERNATIONAL UNION PURSUANT TO FEDERAL RULE OF BANKRUPTCY  
PROCEDURE 2019**

The Service Employees International Union (“SEIU”) states as follows:

1. On May 9, 2019, SEIU filed its *Verified Statement of the Service Employees International Union Pursuant to Federal Rule of Bankruptcy Procedure 2019* (“Statement”). In the Statement, SEIU wrote that Rule 2019 of the Federal Rules of Bankruptcy Procedure does not require SEIU to file a statement; that SEIU was filing the Statement out of an abundance of caution; and that by doing so, SEIU was not waiving, and was expressly reserving, its position that a Rule 2019 statement was not required. SEIU continues to maintain that position. Nonetheless, in light of the June 8, 2020 *Twelfth Amended Notice, Case Management*

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<sup>1</sup> The Debtors in these title III cases, along with each Debtor’s respective title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808), and (iv) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284) (Last Four Digits of Federal Tax ID: 8474).

*and Administrative Procedures* order [Docket No. 13383-1], SEIU files this *Second Verified Statement of the Service Employees International Union Pursuant to Federal Rule of Bankruptcy Procedure 2019*.

2. SEIU is an international labor union, formed in 1921, that represents approximately two million public-sector and private-sector employees in the United States and its territories and in Canada.

3. SEIU is acting in these Title III proceedings on behalf of its two affiliated locals in Puerto Rico, SEIU Local 1996/Sindicato Puertoriqueno de Trabajadores y Trabajadores and SEIU Local 1199/Union General de Trabajadores. These two SEIU affiliates serve as collective bargaining representatives for approximately 25,000 employees of the Commonwealth of Puerto Rico (“Commonwealth”) and its instrumentalities. These affiliates are party to collective bargaining agreements (“CBA’s”) governing terms and conditions of employment of SEIU’s members in Puerto Rico.

4. SEIU does not assert any disclosable economic interest of its own against any of the Title III Debtors.

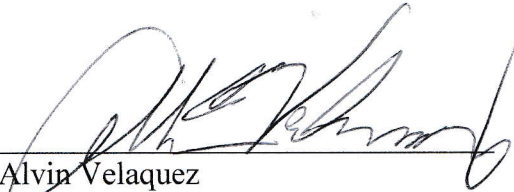
5. SEIU asserts the following categories of disclosable economic interests on behalf of individual employees who are or were employed in bargaining units represented by SEIU or its Puerto Rico affiliates: (1) against the Commonwealth: grievances, grievance settlements and arbitration awards related to breach of the CBA’s and/or applicable labor and employment laws (estimated to be in the aggregate magnitude of between \$1 million and \$10 million), and (2) against the Commonwealth and against the Employees Retirement System: accrued pension obligations (in the aggregate magnitude of greater than \$10 million).

6. SEIU has had the disclosable economic interests described above on May 9, 2019 and on the date of this filing.

7. SEIU reserves the right to amend this Statement.

8. The undersigned, Alvin Velazquez, Associate General Counsel of SEIU, hereby verifies that this Statement is true and accurate to the best of his knowledge, information, and belief.

Executed this 25<sup>th</sup> day of June 2020

  
Alvin Velazquez

Dated: June 25, 2020

Respectfully submitted,

/s/ *Peter D. DeChiara*

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Automobile, Aerospace and Agricultural Implement  
Workers of America (UAW)

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 26<sup>th</sup> day of June 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will notify all counsel of record and caused to be mailed or emailed a copy, as provided in the Case Management and Administrative Procedures order in this case.

/s/ Marie B. Hahn

Marie B. Hahn